

IV.D. Narrative Information Sheet

1. Applicant Identification:

Municipality of Aibonito
PO Box 2004
Aibonito, PR 00705

2. Funding Requested:

a. Assessment Grant Type: Community-wide

b. Federal Funds Requested:

i. \$300,000

ii. We are not requesting a Site-specific Assessment Grant waiver of the \$200,000 limit.

c. Contamination: Hazardous Substances (\$150,000) and Petroleum (\$150,000)

3. Location:

a. Municipality of Aibonito

b. Aibonito

c. Puerto Rico

4. Property Information for Site-Specific Proposals: Not applicable

5. Contacts:

a. Project Director:

Mr. Jorge A Colón Colón

Director of Federal Programs

787-735-8181 ext. 7035

aibonitofederales1@gmail.com & jcolon@aibonitopr.net

PO Box 2004

Aibonito, PR 00705

b. Chief Executive/Highest Ranking Elected Official:

Hon. William Alicea Perez, Mayor

787-735-8181 ext. 7061

aibonitoalcalde@gmail.com

PO Box 2004

Aibonito, PR 00705

6. Population: Census Tracts (CT)¹ containing priority sites: CT2501: 5,234; CT2504: 2,654, and CT2505: 4,965. Population for the Municipality of Aibonito: 24,008 (2013-2017 American Community Survey 5-Year Estimate)

¹Because Applicant is a municipality (similar to a county), population is reported in census tracts in which each priority site is located.

7. Other Factors Checklist:

Other Factors	Page#
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	Page 2
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	Page 4
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	

¹Because Applicant is a municipality (similar to a county), population data is reported in census tracts in which each priority site is located.



GOVERNMENT OF PUERTO RICO

Department of Natural and Environmental Resources

NOV 07 2019

Hon. William Alicea Pérez

Mayor
Municipality of Aibonito
Calle Degetau #55
Aibonito, PR 00705

Honorable Mayor Alicea-Pérez:

**MUNICIPALITY OF AIBONITO ACKNOWLEDGEMENT LETTER FOR THE INTENTION TO APPLY FOR FY-20
US EPA BROWNFIELD'S PROGRAM FOR A COMMUNITY-WIDE BROWNFIELD HAZARDOUS
SUBSTANCES AND PETROLEUM ASSESMENT GRANT**

The Department of Natural and Environmental Resources (DNER) Superfund Program has received a letter from the municipality of Aibonito informing its intention to apply for a Community Wide Brownfields Hazardous Substances and Petroleum Assessment Grant. DNER acknowledges and supports the initiative taken by the Municipality. The identification, inventory development, assessment, cleanup and redevelopment of Brownfields sites will provide an opportunity to enhance the social, economic and environmental conditions in this municipality.

DNER encourages the municipality to maintain an open communication with federal and state agencies and to request any support needed.

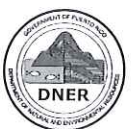
If you have any questions, please feel free to contact Eng. Melvin Menéndez Figueroa, Environmental Emergencies Response Area Manager, at (787) 767-8181, extensions 2400, 2401 or by e-mail at melvinmenendez@jca.pr.gov.

Cordially,

Tania Vázquez Rivera, Secretary

MMF
MMF

c Teresita Rodriguez, USEPA



IV.E. NARATIVE/RANKING CRITERIA

IV.E.1 Project Area Description & Plans for Revitalization, a. Target Area & Brownfields, i.

Background & Description of Target Area: The Municipality of Aibonito (Municipality) is situated in the central region of Puerto Rico (PR), 25 miles southwest of San Juan. Founded in 1824, our municipality is a working-class community known for chicken farming and the flower industry. The Annual Aibonito Flower Festival is held each year in June and July, attracting tens of thousands of tourists to our community. In the 1970's, economic growth moved towards industrialization that allowed for a robust workforce and fostered commercial growth. Our economy was vibrant, in part, due to Section 936 (936 exemption) of the US tax code, which incentivized US companies to operate in PR through valuable tax exemptions. These incentives were eliminated in 2006, causing many companies to leave PR for more tax-friendly countries like Singapore and Ireland. These losses drove Aibonito into a deep recession that has lasted over a decade, leading to job losses and population decline as people left for the US mainland for employment. While residents have seen household income remain unchanged (US Census) from 2007 to 2017, the cost of living increased 18% over the same period. Our residents still feel the impacts of these losses.

In September 2017, Hurricanes Irma and Maria ravaged Aibonito, adding extreme socioeconomic and financial pressures to our already strained municipality. The worst storm in 80 years, Maria's devastating winds destroyed buildings, and torrential rains caused catastrophic landslides and flooding of the Aibonito River. All the electric power and drinking water services were destroyed as were over 600 homes. 25% of commercial properties (many of which are now brownfields), and over 100% of the transportation infrastructure was either blocked by debris or damaged. Basic public services were halted for months and thousands of residents were forced into temporary shelters due to the total loss of their homes. These properties may have released chemicals like lead paint, petroleum, and other environmental hazards. The storm followed a decade-long economic decline as evidenced by population loss, business closures, and abandoned homes. The Center for Puerto Rican Studies estimates a 14% population decline after Maria (2017-2019) as residents migrate to the US mainland for better employment opportunities rather than live in the shattered remains of our Municipality. Those who remain or have returned are fighting to recover what the past decade of loss has taken and are enduring a difficult job market with dozens of employers unable or unwilling to reopen businesses after Maria, in turn, driving our current unemployment to 10.3% compared to 3.5% (9/19, Bureau of Labor Statistics). These challenging conditions have resulted in numerous brownfields in our community as businesses close and caused brownfield redevelopment to slow as resources have been reallocated to more urgent needs.

As employers shuttered their doors after the 936 exemption repeal and hurricanes marred our community, brownfields have steadily become more prevalent. The worst-hit area, where redevelopment investment has the greatest potential, is the Urban Center (UC) This target area is where grant funding will have the greatest impact. A focused effort has been made to invest in the UC, creating detailed reuse plans to maximize investments and leverage funding. If properties outside the target area become high priority during the cooperative agreement period, we may choose to invest grant funds on them as well; however, the redevelopment focus for this grant will remain the UC.

The UC – Located in the central sector of Aibonito, the UC is the most urbanized area of the Municipality, and where the vast majority of commercial and industrial activity occurs. Unfortunately, because of this, the UC was also hardest hit by the elimination of the 936 exemption. The UC workforce decreased by 9.8% from 2000-2017 (US Census). Those still working are doing so for significantly less. According to the 2017 American Community Survey 2017 Estimates (ACS), the Median Household Income is \$16,436, nearly 17% below that of PR (\$19,775) and just over 1/4 of the United States (\$57,652). When Maria hit, after the power outages, water shortages, building damage, and loss of basic government services, many UC businesses who closed were never able to reopen. Municipality officials also state that 80% of property crime activity in the Municipality occurs in the UC. The UC is the location of several priority sites including the Former Succession Tores School, Former Gulf Gas Station, a former wastewater treatment Plant, and the Moscoso Pharmacy property.

Our Revitalization Plans (IV.E.1.b.) recognize the need for additional low income housing and the goal of becoming a regional destination for medical care, particularly in the UC, understanding that this will attract new businesses as the regional population visits for health services. We began to

implement a strategy of creating commercial and industrial development in the UC; however, Maria struck, and all resources were redirected to immediate recovery needs like restoring power, water, and other essential services. Due to months of power outages and lack of workforce/financial resources, many businesses in the UC could not reopen after the storm. Businesses such as Baxter Pharmaceuticals, Toricos Poultry, other poultry and flower industry jobs have closed or cut jobs (estimated 2,000) and many are still trying to recover.

IV.E.1.a.ii. Description of the Priority Brownfield Site(s): Aibonito's economic decline described above resulted in an abundance of brownfields. The target area has a significantly higher concentration of brownfields compared to the rest of our community with the highest priority sites listed in Table 1 offering the greatest opportunity for successful reuse. Although we have worked hard to address brownfields, dozens remain, including former schools, closed gas stations, a former wastewater treatment plant, and the pharmacy. These sites force already financially stressed residents to suffer through the blight that remains. The historical uses our priority sites, likely environmental issues, and potential health effects on those exposed to these uncontrolled sites are summarized in Table 1 below.

Table 1 – Priority Brownfield Sites and Impacts

TABLE 1 Priority Sites, Size, Location, & Proximity to Target Area Residents	Historic Use/Current Use & Condition / Planned Reuse (further discussed in Section IV.E.1.b.i.)	Suspected Contaminants*
Federico Degetau I School – 109 Jose Vazquez St., 5.0 acres, adjoins Aibonito River, low income & minority residential	Former School / vacant, damage from hurricane / Hospital development	asbestos, lead paint, mercury, VOC's, PCB's
Former Gulf Gas Station - PR721, 0.5 acres, adjoins low income & minority neighborhood	Gas Station / vacant, deteriorating structure. USTs believed to remain on site / Commercial development	VOCs, PAHs, metals, petroleum
Former Wastewater Treatment Plant - PR173, 1.2 acres, adjoins Aibonito River, within low income & minority neighborhood	Former privately owned wastewater treatment plant / vacant, deteriorating structures, heavily damaged from hurricane / Low income housing	VOCs, PAHs, metals, petroleum
Moscoso Pharmacy - San Jose St #51, 1.3 acres, adjoins low income & minority neighborhood	Former pharmacy, vacant, historic building, damaged from hurricane / Commercial development	metals, petroleum, VOCs, PAHs, PCBs, lead paint, asbestos
Sucesion Torres School – 724 Palestina St. 1.03 acres, adjoins low income & minority neighborhood, municipal park	Former school / vacant. Structure may be salvageable / Medical facility	asbestos, lead paint, mercury, VOC's, PCB's
*According to the Agency for Toxic Substances and Disease Registry (ATSDR), the contaminants listed in Table 1 pose a real threat to human health. Health threats include: skin damage, liver, kidneys, heart, spleen, nervous, respiratory, hormonal, blood, and immune systems, and may also cause neurological damage, birth defects and cancer (www.atsdr.cdc.gov).		

These sites are our highest priorities because they meet immediate needs in our community, align with our revitalization plans, and redevelopment is imminent due to funding already committed (\$27.1M has already been secured to redevelop residential and commercial assets and a hospital on properties in the target area (IV.E.1.c.i)). Increasing our low income housing stock will help those hardest hit by job losses and the hurricanes and adding a hospital and medical care facility aligns with our goal to become a regional healthcare destination. Once redeveloped, they will serve as examples of success, triggering more investment. With the EPA's grant funding the initial, high-risk due diligence investment on these sites, the likelihood of a successful redevelopment is much higher.

IV.E.1.b. Revitalization of the Target Area, i. Reuse Strategy & Alignment with Revitalization Plans:

The 2011 Aibonito Territorial Plan, 2012 Action Plan, and Aibonito Impulso, our Urban Center Economic Dev. Program (collectively referred to as Revitalization Plans) specify the reuse of existing vacant and underutilized urban space as a key initiative, creating desperately needed low and moderate income housing, modern commercial development, additional educational facilities, and become a regional destination for health care services, particularly in the UC. Our Revitalization Plans call for land reuse that addresses economic and environmental concerns while also addressing equity issues for residents, primarily low-income residents and minorities. Prior to 2017, we had made modest progress implementing our Revitalization Plans, until the hurricanes and the extreme logistical, financial, and physical toll that they levied on our community, which caused a significant setback. However, we are recovering and are now ready to get our Revitalization Plans back in motion.

Per our Revitalization Plans, we will grow our healthcare services and diversify and modernize our employment sectors to minimize the impacts of future employer cutbacks/closures and we'll create

affordable housing and commercial development. This in turn will provide location options for support services for the industrial and commercial base of the area and residential options desperately needed in the UC. Our Revitalization Plans call for an increase in low-income housing, providing residential stock constructed with modern techniques for those people hardest hit by the devastation of the hurricanes. These reuse activities will directly address our greatest needs by adding jobs and residential options and will encourage people to return to Aibonito from the mainland to participate in and benefit from the reconstruction of our community.

Aibonito is requesting \$300,000, most of which will be used for Phase I and Phase II Environmental Site Assessments (ESAs), providing the initial, highest risk investment necessary for brownfields reuse. Funding will also be committed to improving/reprioritizing a recently created inventory and conducting cleanup planning activities. This approach will maximize grant value and trigger further environmental and redevelopment work with other funding as noted in IV.E.1.c.i. For example, plans are underway to redevelop the Federico Degetau I School into a new hospital, creating a state-of-the-art healthcare facility that will serve the eastern Central Mountain region, create hundreds of high paying jobs which per our Revitalization Plans, play an important role in the future prosperity of our community (IV.E.1.b.ii). This development will bring an estimated \$25M in investment to our community and will enable us to realize our goal to become a medical services destination, sorely needed after Maria damaged many healthcare facilities in and around Aibonito. Putting redevelopment resources in the heart of the target area will set an example and maximize the likelihood of growth and reuse in this struggling area of our community. EPA-funded assessment of property will help leverage funding for its revitalization and create an important development in an area where brownfield reuse is badly needed. Development of the Former Wastewater Treatment Plant into low-income housing will meet another important need due to the scarcity of residential options after Maria damaged so many homes. The reuse of the Gulf Gas Station and the Moscoso Pharmacy into commercial space will increase tax revenue, create jobs, and add much needed retail options. Investors have also committed to spending \$2M to redevelop the Sucesion Torres School into another medical facility to treat chronic illness (e.g. cancer, dermatological conditions, hemophilia, etc.). This will create a positive impact in the UC and increases the quality of patient health services while eliminating barriers preventing access to quality medical services. Construction jobs will be created, and permanent jobs will be in place as planned redevelopment of the priority sites is completed (IV.E.1.b.ii).

IV.E.1.b.ii Outcomes & Benefits of Reuse Strategy: Reuse of brownfields will generate more tax revenue for the Municipality. All 5 priority sites are located in an Opportunity Zone (OZ), making the reuse of these sites attractive to investors. Currently, at least 2 Opportunity Funds have been established and are making investments in Puerto Rico (Puerto Rico Opportunity Fund & Wefunder Puerto Rico Opportunity Fund), and we will work with these funding resources and developers to further facilitate investment in our brownfields. Through increased investment, jobs will be created, new residential units will be constructed, and property values will be enhanced. Sites located in OZs will be marketed as such, ensuring that OZ investors are aware of the value brownfield redevelopment brings. Based on previous, similar development projects in our community, the full redevelopment of Table 1 priority sites will create 1,000 construction jobs, 300 permanent jobs, 100 housing units, modern commercial development, and an estimated \$300K in annual tax revenue. Using these sites as examples, this success story can be duplicated on other sites in the community. Redevelopment of the Federico Degetau I School will remove real and perceived environmental contamination (asbestos, lead paint, mercury, VOCs, etc.). Blight will be eliminated, removing the lure for crime that the abandoned property invites. This site could again become a viable asset to the community once its redevelopment into a new hospital (estimated \$27.1M development) is complete. Temporary jobs would be created through construction work to remediate and redevelop the site. Over 300 permanent, high paying jobs will be created when the facility opens, and our community will have access to a high-tech medical facility, improving the health of residents. Creating new commercial development on the former Gulf Station site will create jobs and eliminate blight. Located next to the largest industrial facility in the municipality, this site is poised for reuse but for the perceived contamination from its past use. Low-income housing constructed on the former Wastewater Treatment Plant will add desperately needed low income residential property (estimated 100 housing units), desperately needed after Maria left

many in our community without homes. Rehabilitating the Moscoso Pharmacy into a commercial development will preserve an iconic building in our community, create jobs, and make what is now a drain on public funds a tax generating asset. More permanent jobs will be created when the former Sucesion Torres School is reused as a health center, providing modern health care to regional residents.

Assessment, remediation, and redevelopment will result in new commercial/residential mixed-use development, new housing, and new industrial business. New, low income and elder care housing will be developed, creating safe, affordable residential options (estimated 250 housing units) and eliminate threats to less fortunate and vulnerable residents such as the poor, elderly, and children. These developments will improve the local economy through job creation, adding over 250 jobs (IV.E.1.b.ii) which will reduce poverty. Brownfields reuse increases tax revenue (estimated \$150K annually) which in turn, improves public services. New, energy efficient construction on priority sites will reduce energy usage and operating cost on sites where new construction is planned (Former Wastewater Treatment Plant, Federico Degetau I School, and Gulf Gas Station) which will create jobs, repatriation, and increase wages for Aibonito residents.

Brownfield assessments will be linked to successful redevelopment outcomes such as reduced environmental justice concerns by eliminating contaminant exposure pathways, especially in areas of low income and minority populations. This will create affordable housing, improve economic competitiveness of the UC, create sustainable, commercial developments and land recycling opportunities, leverage current and future investments, and create healthy, safe neighborhoods. Residents and commercial property owners will benefit from increased property value, improved energy efficiency, and lower maintenance costs associated with new construction.

Health indicators such as the increased cancer, liver, and low birth weight (IV.E.2.a.ii(2)) will no longer be influenced by environmental impacts caused by target area brownfields. This will be accomplished in areas where low income and minority populations are highly concentrated, supporting environmental justice goals. Investment dollars have already been identified to help complete the redevelopment of target area properties as indicated in IV.E.1.c.

IV.E.1.c. Strategy for Leveraging Resources, i. Resources Needed for Site Reuse: Target area reuse funding is secured for 4 priority sites (Former Wastewater Treatment Plant, Moscoso Pharmacy, Sucesion Torres School, & Federico Degetau I School). Private sector funding pledges to construct a hospital on the Former Federico Degetau I School (\$25M), a health center on the Succession Torres School, and the municipality has pledged \$94K to invest in the Wastewater Treatment Plant and Moscoso Pharmacy sites. Site redevelopment will begin when due diligence eliminates the risk of the environmental unknowns. Aibonito is eligible for and will seek additional funding from the following sources: EPA Brownfield Clean-up grant funding, US Dept. of Agriculture, CDBG, CDBG-DR (Disaster Relief), FEMA, US Economic Development Administration (USEDA), Dept. of Transportation grants, and new funding opportunities/incentives available in the future. Funding from these resources are available for remediation, demolition, site development, public infrastructure improvements, streetscape improvements, building rehabilitation, job training, etc., to encourage and complete our redevelopment strategies. Aibonito is already pursuing CDBG-DR funding to redevelop the Former Wastewater Treatment Plant. Should EPA funds be awarded for environmental assessment, the EPA grant may qualify as the required match to the CDBG-DR funding, further leveraging funding resources to successfully redevelop this priority site. CDBG funding will be sought to help rehabilitate the Moscoso Pharmacy, and Army Corps of Engineers resources will be sought to reduce the threat of landslides similar to those experienced with Maria. Dept. of Transportation funds will be pursued to make road improvements in the UC, and USED A funds will be sought to incentivize job creation.

We will also seek funds from the Puerto Rico Economic Incentives Act which will be used to encourage commercial development as planned for some of our brownfields. All target properties are located within an Opportunity Zone (OZ), and we will market brownfields as excellent tax shelters under OZ tax incentives, attracting private funds in our low-income areas. We have identified 2 Opportunity Funds in Puerto Rico and will engage them as brownfield redevelopment progresses. We will also attract investors using tax credits through New Markets Tax Credit Benefits. Using EPA funding for the initial high-risk environmental assessment of these sites, brownfield redevelopment will be successful. As properties are assessed, we will work in partnership with many agencies (U.S. Dept.

of Housing and Urban Development (HUD), Federal Emergency Mgmt. Agency (FEMA), PR Dept. of Housing, PR Dept. of Economic Dev. & Commerce, etc.) to fill funding gaps such as demolition funding and redevelopment incentives, ensuring successful redevelopment. A detailed funding plan will be developed for brownfield sites/areas as assessment projects develop. Each site will have a unique funding plan due to individual status and eligibility.

IV.E.1.c.ii. Use of Existing Infrastructure: Modern utility infrastructure is present in the UC, providing available connectivity to all new development. Although, Maria damaged many power lines and some roads, they have since been repaired. Our utility infrastructure is large and robust enough to handle the added capacity and need required by the planned redevelopment of the UC. Redevelopment will utilize existing services and other infrastructure (roads, curb cuts, on- and off-street parking, and nearby utilities) to attract new investment in area brownfields, reducing site redevelopment costs. With revitalization ranging from residential to commercial, existing infrastructure will allow for easy access to commercial/industrial development, enabling residents the opportunity to work and live in the same neighborhood, creating a walkable community. For example, existing infrastructure currently servicing the Federico Degetau I School adequately provides the service requirements to complete the site's planned hospital development. Additional road improvements may be needed to accommodate additional traffic to the medical facility planned for the Sucesion Tores School, which will be sought from both FEMA and the US Dept. of Transportation Better Utilizing Investments to Leverage Development (BUILD) Grant program. If additional infrastructure is needed, we will utilize a combination of local funding, when available, CDBG, and FEMA funds to meet the development's infrastructure needs.

IV.E.2. Community Need and Community Engagement, a. Community Need, i. The Community's Need for Funding: Aibonito needs EPA grant funding to complete brownfield assessments, as we do not have the funds to complete this work in our general budgets. The only available resource to address brownfield redevelopment is federal funding. The PR economy has experienced over a decade of setbacks, resulting in significant economic decline, and culminating with the devastation brought by Hurricane Maria. Fewer jobs, reduced tax revenues, repairs to damaged municipal buildings and infrastructure, and hurricane debris cleanup has further limited local government resources. We estimate the tax losses locally to be \$2M, and over 2,000 jobs were lost in the aftermath of the storm. The Municipality operates on a \$9.8M annual budget, which can't fully fund essential services, let alone much needed infrastructure repair and maintenance. Simply collecting debris from the hurricanes cost \$5.8M. Brownfield sites add to the financial burden borne by target area residents, suppressing residential property values, and adding to municipal expenditures through reduced tax base and additional public safety services to brownfield sites for criminal activity as indicated by the high concentration of crime in the UC compared to Aibonito as a whole. Because of the decade long recession experienced island wide, capped by the destruction of Irma and Maria, the territorial government has no resources to commit to brownfields reuse. Moreover, local governments in PR don't have funding resources commonly available to local governments on the mainland (e.g. Tax Increment Financing), so incentivizing reuse through payment of environmental due diligence is attractive to developers, but we have no tools available at a local or territorial level.

IV.E.2.a.ii. Threats to Sensitive Population, (1) Health or Welfare of Sensitive Populations: Aibonito has a very high population of minorities and poor. This is even more evident in the UC, where nearly 100% of the population is minority, and over half live in poverty. Other sensitive populations are also impacted. 43% of the UC households have one or more people over 65 compared to 25% in the US. Contaminants such as metals, petroleum, VOCs, SVOCs, PAHs, PCBs, glycols, lead paint, and asbestos are potentially causing as yet unknown harm to these people, raising significant environmental justice issues. The result is the exposure of a large number of our less fortunate residents to soil, water, and air contamination present on these brownfields with little ability to improve their condition. For example, the Moscoso Pharmacy site, located adjacent to a low-income, minority neighborhood, is potentially impacted with metals, petroleum, VOCs, PAHs, PCBs, lead paint, asbestos, and other contaminants known to cause various cancers and low birth weight which are experienced by Aibonito's residents at a higher rate than the nation (IV.E.2.a.ii(2)). The proximity of brownfields to low-income neighborhoods in our target area drives down housing values, suppresses commercial investment, and limits residents' access to adequate employment, resulting in a distinct disadvantage to

target area residents with no real relief in sight, if nothing changes. The former Waste Water Treatment Plant is located just 200' from a school, introducing health threats to a large group of children through proximity to potential contaminants.

This grant will help our community better understand the environmental conditions at our brownfields and help reduce the risk of exposure, eliminate sources of contamination, improve the ecological health of our community, and incorporate livability and equitable development principles.

IV.E.2.a.ii(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions: Sites such as the former schools and the Moscoso Pharmacy are known or believed to be impacted by asbestos. Studies on the health effects of exposure to asbestos has been linked to higher incidences of lung cancer, which in Aibonito (28.1/100,000) are over 50% higher than PR. Gas stations such as the Gulf site are known or believed to be contaminated with petroleum, which is known to affect the liver. Liver & bile duct cancer incidences in Aibonito are 84% more common than in PR. In addition, metals and VOCs on target area sites may be contributing renal cancers in residents, which 16% higher in Aibonito than in PR (all cancer stats from PR Cancer Registry). Moreover, mercury, lead, and other metals, as well as VOCs, PAHs, and petroleum constituents are believed to be present on priority sites. These are known to be a threat to unborn children and infants, and the low birth weight rate in Aibonito is 32% higher than the US according to the CDC and the PR Dept. of Health.

Currently, there are 20 properties in the Municipality that have environmental records in the EPA's EnviroFacts database. Nearly half (45.6%) of the housing stock in the Municipality was built prior to 1979 according to the 2017 ACS and older homes have a greater risk for high lead levels from paint. Because of the presence of toxic chemicals and their inevitable impact on the environment near residents' homes, many operating commercial and industrial facilities add to the environmental threat. Removal of environmental contaminants at brownfields in our community will reduce exposure of our residents, which will help to reduce the disproportionate incidences of disease and other poor health outcomes that disadvantaged populations are currently experiencing.

IV.E.2.a.ii(3) Disproportionately Impacted Populations: The public health impact from target area brownfield properties and industrial operations, and their proximity to impoverished and minority residents has disproportionately exposed them to environmental pollutants such as lead, VOCs, asbestos, PCBs, etc., resulting in an inability to improve or in some cases, maintain their health and wellbeing. Per the Urban Institute/Center on Society and Health (2015), low-income residents become sick more frequently and more quickly, and die at younger ages on average than those in more affluent communities. For decades, Aibonito suffers extraordinarily low wages and a very high poverty rate. The devastation left by the hurricanes added unprecedented financial burdens to our already poor residents through storm damage costs, loss of work, loss of basic necessities, and very slow recovery. The loss of once thriving industries has left a void in the community, especially in the UC. According to the 2017 ACS, 49.2% of Aibonito residents live in poverty compared to 44.9% and 14.6% for PR and the U.S. respectively. 51% of the UC residents are living in poverty, and The MHI is \$16.4K and, far below the US figures (\$57.7K). It is clear that target area residents suffer dramatic wage disparities. The EPA's EJScreen tool indicates that the UC is in the 95-100th percentile of US citizens in close proximity to Ozone and PM 2.5 pollution. Our poor and minority residents are at a clear disadvantage, and there is little incentive for residents to maintain their own properties, let alone contribute meaningful change to the community, resulting in significant environmental justice concerns.

The EPA grant will reduce threats by funding environmental investigation work needed to trigger stalled redevelopment on priority sites. New jobs in the target area will create gainful employment for target area residents, reducing the unemployment and poverty rate and increasing household income. Increased employment, higher wages, and new development on brownfield properties will create a sense of pride and ownership of the neighborhood, incentivizing investment in other area properties. New tax revenue will be generated and subsequently reinvested in the community, multiplying investment in the UC.

IV.E.2.b. Community Engagement, i. Project Partners & ii. Project Partner Roles: Several community partners have pledged a supporting role for our brownfields program (Table 2). This assemblage of community groups is best suited to engage the community at a grass roots level. They also have regional influence and local ties, maximizing the benefits they bring to the project.

Table 2 – Project Partners

Partner Name	Point of Contact	Description and Specific Role in the Project
Centro PASO	Mary Miranda centropasoaibonito@gmail.com (787) 402 – 9552	Community based non-profit aiding residents with social services and hurricane relieve who will provide space for and participate in community engagement events.
Casa Pensamiento de la Mujer	Jennifer Berrios 787-735-6698 casapensamientodemujer@gmail.com	Grass roots community organization focused on helping families through difficult times; organization has strong ties to the community at a household level and will use these relationships to inform people of community of engagement events and help solicit feedback from individual residents on brownfield redevelopment
Envejecer en Armonia	Bernice A. Felix Rodriguez 787-735-2126 envejecerenarmonia@gmail.com	Non-profit advocate for local elderly population who will help plan low income housing projects and provide needs-based data and support for the procurement of additional grants to complete residential development on brownfields.
View Graphics	Brenda Serrano (787) 735-3705 viewgraphics01@gmail.com	Local commercial retailer & leader of downtown business advocacy group focused on commercial growth of downtown who will assist in inventory/prioritization & redevelopment planning in the UC.

IV.E.2.b.iii. Incorporating Community Input: Aibonito has a well-established community involvement program that we will maintain for this grant. Our most recent community engagement event was held on October 28, 2019 to inform residents of the grant effort. 4-6 public meetings will be held throughout the grant to maintain stakeholder engagement and continue to gather input on site selection, prioritization, assessment needs, cleanup decisions, mitigation measures from the cleanup and redevelopment activity, and reuse planning. Public meetings will be advertised through municipal and partner websites, newspapers, radio, and social media (earned media and other low-cost/no-cost, or in-kind methods) ensuring that the entire community has an opportunity to provide input. Because we have a large non-English speaking population, Aibonito has multi-lingual staff to interpret presentations and translate documents in Spanish and English. We've already begun engaging target area residents, business owners, and community advocates to solicit their input regarding our brownfield project and will continue to do so during the grant period. A public meeting will be held in the second quarter of the grant period to discuss goals, planned activities, and a schedule for future community involvement. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize stakeholder engagement. We will contact regional developers to bring awareness of the reuse opportunities priority sites offer. When developers are identified, they will attend public meetings to share their redevelopment plans. Aibonito staff will catalog stakeholder input for reference when determining assessment and redevelopment priorities. As the project progresses, we will involve stakeholders in the decision-making process regarding prioritization, assessment, site marketing, cleanup planning, and feedback on reuse. When stakeholder input is received, we will evaluate it against our development goals and available resources, adopting input that feasibly meets these criteria.

IV.E.3. Task Descriptions, Cost Estimates, & Measuring Progress, a. Description of Tasks/Activities & Outputs: Aibonito will begin grant-related activities immediately upon award confirmation, working to prepare a Work Plan approved by the EPA PM/PO. Once the Work Plan is approved, we will select a Qualified Environmental Professional (QEP) in accordance with federal procurement regulations (2 CFR 200.317 - 200.326). The Municipality has begun developing a brownfield inventory and will use it as a tool to help accomplish brownfield reuse goals. Inventoried sites are prioritized based on the following criteria, in no particular order: 1) reuse potential, 2) potential for environmental or human health impact and environmental justice, and 3) community input. Brownfield redevelopment progress will be carefully tracked with regular entries into ACRES, public meetings, and coordination with the QEP. Aibonito and its QEP will complete the following tasks:

Task/Activity 1: Program Management, Training Support, Brownfield Inventory/Prioritization

i. Project Implementation: Municipality staff will travel to regional and national brownfields conferences/meetings, participate in calls, meetings, and correspondence between the Municipality, QEP, EPA, etc. to manage the grant's cooperative agreement. ACRES database will be updated quarterly or more frequently if needed. We will carefully track contractor costs, comparing to the budget, expenditures, and project progress. This will ensure that grant funds will be successfully utilized within the prescribed three-year project period. The Municipality, with QEP support, will also

update/prioritize the inventory under this task.

ii. Anticipated Project Schedule: QEP selected through a competitive bidding process before Cooperative Agreement period begins; correspondence will occur at least monthly (more frequently as specific project activities require) throughout the grant period; update and prioritize brownfield inventory the first 2 quarters, then as necessary for the remainder of the grant period; ACRES updates will be conducted at least quarterly throughout the grant period

iii. Task/activity Lead(s): Aibonito & QEP

iv. Output(s): Travel-Municipal staff to regional and national brownfields conferences/meetings; prioritized inventory; project performance reports: Quarterly Reports, ACRES Entries, DBE reports, annual reports, etc.; calls, meetings, and correspondence between the Municipality, QEP, EPA, etc. to manage the grant's cooperative agreement.

Task/Activity 2: Env. Investigation

i. Project Implementation: Eligibility determinations will be completed under this task; The QEP will complete Phase I ESAs activities on sites selected by the Municipality. All Phase I ESAs will be conducted by/in accordance with the ASTM standard for Phase I ESAs (E1527-13) and the All Appropriate Inquiry (AAI) rule. Areas of focus will include those already identified as priority sites listed in Table 1; The QEP will prepare a Quality Assurance Project Plan (QAPP) which must be approved by the EPA. Once approved, the QEP, directed by the Municipality, will complete Phase II ESAs (after the completion and EPA approval of the Sampling & Analysis Plan/Health & Safety Plan (SAP/HASP) based on environmental conditions identified in the preceding Phase I ESAs.

ii. Anticipated Project Schedule: Request eligibility determinations & finalize site access to initial sites for investigation-early 2nd Quarter of Grant period; Begin Phase I ESAs-2nd Quarter of Grant period; Submit QAPP to EPA for review/approval; QAPP approval & Phase II ESAs begin-3rd Quarter of Grant period; all Phase I ESAs completed-end of 11th Quarter of Grant period; all Phase II ESAs completed, and final contractor invoices submitted-45 days before end of grant period.

iii. Task/activity Lead(s): Aibonito & QEP

iv. Output(s): 5-6 Phase I ESAs each for haz. substance and petroleum impacted sites; Quality Assurance Project Plan (QAPP), estimated 3-5 Phase II ESAs each for haz. substances and petroleum impacted sites.

Task/Activity 3: Clean-up Planning:

i. Project Implementation: The QEP, directed by the Municipality, will prepare site specific clean-up plans/documents, including: Analysis of Brownfield Cleanup Alternatives, remediation plans, site closure letter requests, and clean-up funding development (IV.E.1.c.i).

ii. Anticipated Project Schedule: throughout the grant period

iii. Task/activity Lead(s): QEP

iv. Output(s): 5-10 cleanup planning documents

Task/Activity 4: Community Outreach & Involvement:

i. Project Implementation: 4-6 public meetings will be held during the grant period to update the community on brownfield assessment progress and seek public input/involvement. Print and mail material for project/site information and marketing documents may also be funded under this task. The Municipality will complete this task, assisted by the QEP, who will manage the technical aspects of the community outreach program. Social media outlets and other online media will be developed/maintained, and outreach efforts will inform the public on the progress of brownfield investigation/cleanup planning activities and provide marketing resources for future development.

ii. Anticipated Project Schedule: 1st outreach meeting planned for 2nd Quarter of grant period, remaining outreach events planned throughout the rest of the grant period.

iii. Task/activity Lead(s): Aibonito & QEP

iv. Output(s): 4-6 public meetings to update the community on the brownfield assessment progress and seek public input and involvement; supplies: printed flyers, advertising, postage, etc.

We will work diligently to assure startup activities are completed per the schedule above. The Municipality will allocate all grant funds to project properties before the final quarter of the grant period to assure that grant task activities are completed before the end of the cooperative agreement contract. The Cooperative Agreement period is 3 years, however, because there is an extremely high demand for assessments and site access has already been obtained for some of the highest priority sites

in Table 1 (Former Moscoso Pharmacy and both schools), it is likely that funds will be spent prior to the end date. If activities occur beyond the priority sites, they will occur after the inventory and prioritization is finalized (early 2nd quarter as indicated above). We are proactively communicating with representatives of privately-owned brownfields to gain access and resolve issues in anticipation of this grant funding as well as non-grant funded assessment activities. Such communication initiates the process for eventual property transfer and redevelopment. These discussions create a positive dialog between property owners, local government, and impacted citizens. Prior to applying for site eligibility under the grant, an access agreement will be prepared and executed for each site being considered.

IV.E.3.b. Cost Estimates: The Municipality will allocate \$242,300 to Phase I and II ESAs, equaling 81% of the grant directly to ESAs. The costs outlined in Table 3 were developed anticipating tasks needed to efficiently identify, characterize, and plan for the remediation of the priority sites in Table 1.

Table 3 Budget	Budget Categories ¹	1. Program Mgmt, Training Support, Inv/Prioritization	2.Phase I/II ESAs	3. Clean-up Planning	4. Community Outreach & Involvement	Budget Category Total
Haz Subs	Travel	\$1,500				\$1,500
	Supplies				\$100	\$100
	Contractual ²	\$6,000	\$121,150	\$15,000	\$6,250	\$148,400
	Subtotal (Haz)	\$7,500	\$121,150	\$15,000	\$6,350	\$150,000
Petro	Travel	\$1,500				\$1,500
	Supplies				\$100	\$100
	Contractual ²	\$6,000	\$121,150	\$15,000	\$6,250	\$148,400
	Subtotal (Pet)	\$7,550	\$121,150	\$15,000	\$6,350	\$150,000
TOTAL BUDGET		\$15,000	\$242,300	\$30,000	\$12,700	\$300,000

¹Only budget categories with costs in Table. ²In accordance with Federal, Territorial, and local procurement regulations.

The costs outlined in Table 3 above were developed anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed in Table 1. Grant tasks will be completed at the anticipated costs per unit with the following anticipated outputs/outcomes:

1. Program Management, Training Support, Inventory/Prioritization - \$15,000 (\$7,500 each for haz. substances and petroleum) – **Travel** (Attend National Brownfields Conf.): airfare x 2 @ \$1,000, 2 rooms, 3 nights lodging @ \$1,400, meals @ \$450, ground transportation @ \$150 = \$3,000), **Contractual**: total \$12,000, includes approximately 104 hrs. \$77/hr. = \$8,000 for inventory, and approximately 52 hours \$77/hr = \$4,000 for program management. In addition, existing funds supporting Municipality staff (\$8,000) will be offered in-kind for this task.

2. Env. Investigation - \$242,300 (\$121,150 each for haz. substances and petroleum) – **Contractual**: 11 Phase I ESAs at an average cost of \$3,500 = \$38,500, & 6-10 Phase II ESAs at an estimated cost of \$20,000-\$40,000 (depending site complexity/environmental conditions) = \$203,800. Though our budget will support 11 Phase I's and 6-10 Phase II ESAs, we understand that large sites may need more investment requiring us to realign the budget during the grant period. Areas of focus will include those already determined in the inventories as priority sites listed in Table 1.

3. Clean-up Planning: \$30,000 (\$15,000 each for haz. substances and petroleum) – **Contractual**: 5-10 clean-up plans expected to cost \$3,000-\$6,000 each = \$30,000.

4. Community Outreach & Involvement: \$12,700 (\$6,350 each for haz. substances and petroleum) – **Supplies**: printed flyers, advertising, grant fact sheets, outreach visual aids, advertising, postage, etc. = \$200, **Contractual**: approximately 162 hours over three years at an estimated \$77/hr = \$12,500.

IV.E.3.c. Measuring Environmental Results: Tracking, measuring, and evaluating progress will be achieved through meeting minutes, Quarterly and Annual Financial Reports, quarterly review/analysis of any grant performance encountered/identified in Quarterly Reports, and completion of Work Plan tasks. If planned outputs/outcomes are not achieved or milestones/project schedule outlined in IV.E.3.a are not being met, we will create a corrective action plan to identify deficiencies and make the appropriate adjustments necessary to achieve the anticipated outputs on schedule. Further, the Assessment Grant will have the following measurable outcomes: sites/acreage assessed, jobs created/retained, redevelopment complete, number of parcels, acreage made ready for greenspace/recreation, and leveraged monies. These and other statistics will be included in quarterly reports and ACRES submittals as data becomes available, which will allow the EPA to better evaluate and highlight the grant program success At the close of the project, the Municipality will provide a final

report to the EPA and our residents summarizing project outputs and outcomes.

IV.E.4. Programmatic Capability & Past Performance, a. Programmatic Capacity, i. Organizational Structure & ii. Description of Key Staff: Aibonito's Dept. of Federal Programs (DFP) will manage this grant. This office has previously managed many other economic development resources valued at over \$25M in the past 10 years, including those listed in IV.E.4.b.ii(1). The DFP, supported by other staff have the technical, financial, and administrative ability in place to implement this grant successfully. Mr. Jorge Colon, Director of Federal Programs will serve as the Project Manager and will handle the day to day programmatic tasks, oversee/manage the work performed by the contracted environmental consultant, and will lead community outreach activities. Mr. Colon has been with Aibonito for 7 years and has 7 years of grant management experience. He has been integral to the success of many other grant programs in which Aibonito has participated, including those listed in IV.E.4.b.ii(1), and has extensive experience managing grant activities for Aibonito. Mr. Colon will be assisted by Angelica Camacho, Director of Planning who holds a Masters in Planning and 11 years' experience in planning and redevelopment design. Both Colon and Camacho will use their previous brownfield redevelopment and economic development experience to seek reuse opportunities for those sites without secured redevelopment contracts. Aibonito's Director of Finance, Tomas Colon, will serve as the Grant Financial Manager and will be responsible for accounting and financial reporting. He has provided these services on many other grant and loan programs benefiting the Municipality. Mr. Colon will be assisted by the Aibonito Department of Finance staff. Staff assigned to this project have all worked for the Municipality for at least 6 years. The Municipality workforce is stable with little staff turnover.

IV.E.4.a.iii. Acquiring Additional Resources: Through a competitive bidding/procurement process, we will select a QEP in accordance with federal procurement regulations (2 CFR 200.317 through 200.326) and with experience with EPA Brownfields Grants and working with the PR Department of Natural and Environmental Resources (DNER). The team and execution plan outlined above will ensure timely and successful expenditure of funds within the prescribed 3-year project period. As previously indicated, federal funds are our only resource to redevelop brownfields. We are pursuing funds from multiple federal agencies with the intent to piece together all the necessary funding to successfully redevelop brownfield properties. Some examples of federal funding we will seek include FEMA to develop low-income housing on the Former Wastewater Treatment Plant site, CDBG-DR funding to demolish the Gulf gas station and the Federico Degetau I School, Dept. of Transportation to make road improvements, and USEDPA to incentivize job creation. As appropriate, we will utilize visioning sessions and other assistance/advice offered by the Center for Creative Land Recycling (Region 2 TAB program) to maximize the incorporation of community input.

IV.E.4.b. Past Performance & Accomplishments, ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements, (1) Purpose & Accomplishments: Aibonito has never received an EPA Brownfields grant, however, we have received other federal and non-federal assistance agreements as indicated in Table 4.

Table 4 – Past Federally Funded Assistance Agreements

Funding Source - Date	Project	\$ Received	Outputs/Outcomes
HUD Section 8 Program	Low Income Housing Construction	\$650,000	100 apartment units constructed; low income elderly residents provided with safe, affordable housing
Community Development Block Grant (CDBG)	Low/moderate income housing rehabilitation	\$454,706	Provided building materials assistance to rehabilitate 40 deteriorated housing units owned by low income families in the Municipality.
Federal Transportation Agency	Transit Planning	\$558,093	Improvement to a public transit terminal & a feasibility study for a regional transit service program for the central mountain region

IV.E.4.b.ii(2) Compliance with Grant Requirements: All funding assistance agreement terms and conditions were met for the above-mentioned projects, including reporting of the number of residential units constructed and who/where/how many received section 8 vouchers under the HUD program, financial reports, quarterly progress reports, and final reports were completed. HUD quarterly and final reports are similar to the EPA Brownfields Grant program's, and are due at the same time; therefore, a coordinated effort will be used to create a synergy in reporting outputs/outcomes of both when we have funding from these programs simultaneously. All goals, outputs, and outcomes (indicated in Table 4) in the workplans of the previous grants were achieved, and reports discussed were completed in a timely manner. The Municipality was fully compliant with the terms and conditions of these grant programs.

III.B. Threshold Criteria for Assessment Grants

III.B.1 Applicant Eligibility

The Municipality of Aibonito meets the definition of a Local Government under 2 CFR 200.64 and is a political subdivision of the Territory of Puerto Rico. It is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

III.B.2 Community Involvement

Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community's Brownfields program's success. Communication is a two-way process, and our ultimate goal is to keep the community informed and involved so they remain aware of potential concerns, questions and solutions. Aibonito will utilize social media platforms, earned (free) media and other low-cost, no-cost or in-kind methods to engage the community, solicit public and stakeholder participation, and advertise public meetings. Regular public meetings have already been and will continue to be held to engage the public and encourage stakeholder and residents' participation in the EPA grant funded Brownfield activities. See Section IV.E.2.b. of the Narrative/Ranking Criteria for further information.

III.C. Expenditure of Assessment Grant Funds

This criterion is not applicable as Aibonito is not a current EPA Brownfields Assessment Grant recipient.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

12/03/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

MUNICIPIO DE AIBONITO

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS:

8298407550000

d. Address:

* Street1:

PO BOX 2004

Street2:

* City:

AIBONITO

County/Parish:

* State:

PR: Puerto Rico

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

00705-0000

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr .

* First Name:

JORGE

Middle Name:

* Last Name:

COLON COLON

Suffix:

Title:

DIRECTOR OF FEDERAL PROGRAMS

Organizational Affiliation:

* Telephone Number:

7877358181

Fax Number:

* Email:

AIBONITOFEDERALES1@GMAIL.COM

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-19-05

* Title:

FY20 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

FY19 MUNICIPALITY OF TOA ALTA COMMUNITY WIDE BROWNFIELDS ASSESSMENT GRANT FOR HAZARDOUS SUBSTANCES AND PETROLEUM

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant 00-000

* b. Program/Project 00-000

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2020

* b. End Date: 09/30/2022

18. Estimated Funding (\$):

* a. Federal	300,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	300,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr. * First Name: JOEL

Middle Name:

* Last Name: MARKLAND

Suffix:

* Title: CONSULTANT

* Telephone Number: 3175684233 Fax Number:

* Email: JMARKLAND@BCACONSULTANTS.COM

* Signature of Authorized Representative: JOEL MARKLAND * Date Signed: 12/03/2019